

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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The STATE of TEXAS, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN JR., in his official capacity  
as President of the United States, *et al.*,

Defendants.

Civil Action No. 3:22-cv-00780-M

**JOINT STATUS REPORT**  
**REGARDING JURISDICTIONAL DISCOVERY**

Pursuant to the Court's Order of August 22, 2022, ECF No. 50, the parties jointly provide the Court with an update on the status of jurisdictional discovery.

Since the last update to the Court, the parties have continued to confer regarding the written discovery requests exchanged on March 1, 2023. In light of the scope and extent of the requests, the parties have agreed to extend their deadline to reciprocally serve their responses and objections two weeks, until May 15, 2023.

Additionally, on April 11, 2023, Defendant U.S. Department of State and U.S. Department of Homeland Security jointly posted a Federal Register Notice (FRN) pertaining to the Central American Minors Program, RIN 1615-ZB98. A copy of the FRN is attached hereto as Exhibit A. The parties are currently evaluating how this FRN might affect this case and will confer to determine whether this warrants new pleadings and/or revisions to the discovery requests.

In light of this activity, the parties respectfully request that the Court continue the stay

governing this matter and continue to hold all pending deadlines in abeyance. The parties will file a joint status report providing a further update on the progress of jurisdictional discovery on or by May 15, 2023.

Dated: April 17, 2022

Respectfully submitted,

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**Certificate of Service**

On April 17, 2023, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

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/s/ Joseph A. Darrow  
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U.S. Department of Justice